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 James Dzurenda and Michael Minev*

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

GREGORY BOLIN,

 Plaintiff,

 v.
 DR. KOHN, *et al.*,

 Defendants.

Case No. 3:23-cv-00168-MMD-CLB

**ORDER GRANTING JOINT
 STIPULATION FOR
 EXTENSION OF TIME TO FILE
 RESPONSE TO MOTION FOR
 PRELIMINARY INJUNCTION
 (ECF No. 58)**

Plaintiff, Gregory Bolin, by and through counsel, Julie D. Cantor, J. Cantor Law, and Paula M. Armeni, Clark Hill, PLC and Defendants James Dzurenda and Michael Minev, by and through counsel, Aaron D. Ford, Nevada Attorney General, and Douglas R. Rands, Senior Deputy Attorney General, of the State of Nevada, Office of the Attorney General, hereby submit this *Joint Stipulation for Extension of Time to file Response to Preliminary Injunction*.

MEMORANDUM OF POINTS AND AUTHORITIES

I. BACKGROUND AND RELEVANT PROCEDURAL HISTORY

Mr. Bolin filed this case alleging violations of his constitutional rights.(ECF No. 5) Defendants have accepted service.(ECF No. 13) On or about March 25, 2024, this Court issued a Scheduling Order and Discovery Plan.(ECF No. 29) Mr. Bolin filed a Motion for Preliminary Injunction on June 2, 2025. (ECF No. 58) The response is due on June 16, 2025. Counsel for the Defendants is scheduled to begin a jury trial on June 17, 2025 in

1 Federal District Court in Reno. Due to trial preparation it will be difficult to craft a proper
2 response by the deadline. Therefore, the Parties request additional time for the response.

3 **II. APPLICABLE LAW FOR MOTION TO STAY DISCOVERY**

4 Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and provides as
5 follows:

6 When an act may or must be done within a specified time, the
7 court may, for good cause, extend the time: (A) with or without
8 motion or notice if the court acts, or if a request is made, before
9 the original time or its extension expires; or (B) on motion made
after the time has expired if the party failed to act because of
excusable neglect.

10 Defendant's request is timely and will not hinder or prejudice Mr. Bolin's case but will
11 allow for a thorough opportunity to respond to the motion. The requested extension of
12 time should permit the Defendant time to adequately gather the required exhibits and
13 prepare the response. Defendant asserts that the requisite good cause is present to
14 warrant the requested extension of time. Counsel has a trial that begins on June 17,
15 2025 and requires the remaining time to prepare for the trial. This is the first extension
16 request on this response and is made in good faith.

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1 **III. CONCLUSION**

2 Defendants assert that the requisite good cause and extenuating circumstances are
3 present to warrant the requested extension of time. Therefore, Defendants requests an
4 extension to file their response to Plaintiff's Motion for Preliminary Injunction. The Parties
5 request an extension of 25 days, or to **Friday, July 11, 2025**, to file the Defendants'
6 response.

7 DATED this 13th day of June, 2025.

DATED this 13th day of June, 2025.

8 J. CANTOR LAW
9 CLARK HILL PLLC

AARON D. FORD
Attorney General

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11 By: /s/ Julie D. Cantor, MD, JD
12 Julie D. Cantor MD, JD
13 Paola M. Armeni, Esq.
Attorneys for Plaintiff

By: /s/ Douglas R. Rands
DOUGLAS R. RANDS, Bar No. 3572
Senior Deputy Attorney
Attorneys for Defendants

14 **IT IS SO ORDERED.**

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16 **UNITED STATES JUDGE**

17 **DATED:** June 16, 2025
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